

November 10, 2004

Mr. Steve Cassinis
Vice President
Cottrell International, LLC
6120 E. 58th Ave.
Commerce City, CO 80022

Subject: **ProSpray Wipes**
EPA Registration No. 46851-10
Application Dated October 18, 2004

Dear Mr. Cassinis:

This will acknowledge receipt of your notification, submitted under the provisions of PR Notice 98-10, FIFRA section 3 (c) 9.

Proposed Notification:

- Alternate Brand Name
 - Vital Defense Wipes

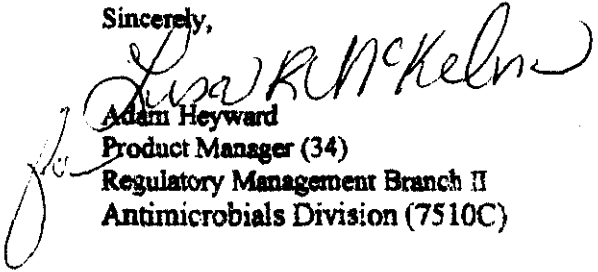
General Comments:

Based on a review of the material submitted, the following comment apply.

A copy of the accepted notification has been inserted in your file for future reference.

Should you have any questions or comments concerning this letter, please contact me at (703) 308-6422, or Lisa McKelvin at (703) 308-7496.

Sincerely,


Lisa R. McKelvin
Adam Heyward
Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510C)

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Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0090, Approval expires 2-28-95

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number Cottrell International, LLC / 46851-10	2. EPA Product Manager Adam Heyward	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Cottrell International, LLC / ProSpray Wipes	PM# 34	
5. Name and Address of Applicant (Include ZIP Code) Cottrell International, LLC 6120 E. 58th Ave., Commerce City, CO 80022 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	NOTIFICATION Date Reviewed: 10-27-04 Reviewed By: [Signature]
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Alternative Brand Name per PR Notice 98-10. The alternative brand name is "Vital Defense Wipes". This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	If "Yes" Unit Packaging wgt. 34.7 oz (1080 gr)	No. per container 72
* Certification must be submitted		If "Yes" Package wgt	No. per container		
Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 72 Pre-moisten towelettes		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product				<input type="checkbox"/> Lithograph Paper glued Stenciled <input checked="" type="checkbox"/> Other flexographic or roto gravure	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Steve Cassinis	Title Vice President	Telephone No. (Include Area Code) 303-799-9401
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Detc. Application Received (Stamped)
2. Signature 	3. Title Vice President	
4. Typed Name Steve Cassinis	5. Date 10/18/04	

October 18, 2004

VIA Regular Mail:

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
401 M Street S. W.
Washington, D.C. 20460-0001

NOTIFICATION
Date Reviewed: 10-27-04
Reviewed By: L. McKeelin

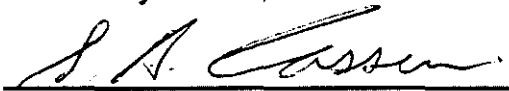
**Notification of Alternative Brand Name per PR Notice 98-10
Vital Defense Wipes (EPA No. 46851-10)**

This letter along with the attached EPA form 8570-1 and one copy of our label is intended to notify you of our alternative brand name "Vital Defense Wipes" for our basic registration product ProSpray Wipes, EPA No. 46851-10.

Please let me know by email (scassinis@gocertol.com) or fax (303-799-9408) or phone (303-3-9401) when you have received this notification ok.

Thank you for your assistance in this matter.

Sincerely Yours,



Steve Cassinis, Vice President

Disinfectant Towelettes
Tuberculocidal, Virucidal,
Bactericidal, Fungicidal

Active Ingredients
o-phenylphenol0.28%
o-benzyl-p-chlorophenol0.03%
Inert Ingredients99.69%
Total100.00%

Reorder No: VITALW

72 Pre-moisten Towelettes

CAUTION: Keep Out of Reach of Children

with
Lemon Scent

9 x 10 In. (22.86 x 25.4 cm)
Packet Net Contents: 34.7 oz (1080 grams)

NOTIFICATION
Date Reviewed: 10-27-04
Reviewed By: L. McKeelin

Distributed by:
VITAL DEFENSE Company
6120 E. 58th Ave.
Commerce City, CO 80022 USA
1-800-218-2002

E.P.A. Reg. No. 46851-10-74975
E.P.A. Est. No. 70806-OH-001
DIN02231483



+H818PSWP00H

***KILLS HIV ON PRE-CLEANED ENVIRONMENTAL SURFACES/OBJECTS PREVIOUSLY SOILED WITH BLOOD/BODY FLUIDS** in healthcare settings or other settings in which there is an expected likelihood of soiling of inanimate surfaces/objects with blood or body fluids, and in which the surfaces/objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of human immunodeficiency virus Type 1 (HIV-1) (associated with AIDS).

SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV-1 OF SURFACES OR OBJECTS SOILED WITH BLOOD OR BODY FLUIDS.

- **PERSONAL PROTECTION:** When handling items soiled with blood or body fluids or when conducting procedures which might lead to contact with blood or body fluids always wear items such as heavy-duty Nitrile gloves, gowns, masks, and eye coverings.
- **CLEANING PROCEDURES:** Blood and body fluids must be thoroughly cleaned from surfaces and objects prior to disinfection. Apply Vital Defense wipes, Disinfectant Towelettes directly to the surface to be cleaned and then discard.

- **DISPOSAL OF INFECTIOUS MATERIAL:** Blood and other body fluids should be autoclaved and disposed of according to local regulations for infectious waste disposal.

PRECAUTIONARY STATEMENTS

- **CAUTION:** Avoid contact with eyes and clothing. Protective gloves should be worn.
- **STATEMENT OF PRACTICAL TREATMENT:** If in eyes, flush with plenty of water. Seek medical attention if irritation persists.
- **STORAGE AND DISPOSAL:** Store at room temperature. Do not reuse towelettes. Dispose of used towelettes and empty packets in regular trash.

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A SYNTHETIC PHENOL SOLUTION IMPREGNATED IN A UNIFORM RELEASE TOWELETTE

Vital Defense wipes, Disinfectant Towelettes are intended for use in hospitals, medical, dental and veterinary offices, laboratories, industrial clean rooms, nursing homes, ambulances, police, hotels, schools, homes, health spas, boats, autos, and toilet seats. Use on inanimate surfaces and equipment such as stainless steel, formica, glass tables, carts, baskets, counters, cabinets, telephones and other hard non-porous surfaces.

Preparation of Dispenser: Lift up tab and pull back to expose the entire opening. Do Not Remove Peel & Seal Tab. Grasp exposed edge of towelette and pull out. Close Peel & Seal tab to prevent evaporation, by returning it to its original position and press down firmly.

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

DIRECTIONS FOR USE: DO NOT USE AS A BABY WIPE. Remove one Vital Defense wipes, Disinfectant Towelette, unfold, wipe surface to remove gross filth. Use a second towelette to thoroughly wet surface. Ensure surface remains wet for 10 minutes to destroy or inactivate bacteria including Escherichia Coli 0113, Staphylococcus aureus, Salmonella typhosa, Pseudomonas aeruginosa, Mycobacterium tuberculosis, fungi including Trichophyton mentagrophytes, and the following viruses* Polio virus 1, Herpes simplex virus types 1 & 2, Vaccinia virus, Influenza virus type A 1 (New Jersey) and Influenza B (Maryland).

This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly into the human body, either into or in contact with the blood stream or normally sterile areas of the body, (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise normally sterile areas of the body. This product may be used to pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.